

1 UNITED STATES DISTRICT COURT  
 2 DISTRICT OF NEVADA

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FILED ENTERED	RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
AUG 14 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

4 NICOLE THOMPSON,

5 Plaintiff,

6 vs.

7 TRW AUTOMOTIVE U.S. LLC, et al.,

8 Defendants.

CASE NO. 2:09-cv-1375-JAD-PAL

**TRIAL STIPULATION REGARDING  
MEDICAL EXPENSES**

9 The parties have reached certain agreements concerning medical expenses and propose  
 10 the following jury instruction be given during Plaintiff's case-in-chief:

11 **1. The parties have agreed to certain facts to be placed in evidence as Exhibit**  
 12 **25. You should therefore treat these facts as having been proved.**

13 a. Exhibit 25 is a list of all of Plaintiff's medical bills, which excludes Plaintiff's  
 14 medical bills from Lemper Pain Centers (collectively Plaintiff's Exh. 214), Dr. Brian Lemper  
 15 (Plaintiff's Exh. 214a), the Center for Surgical Intervention (Plaintiff's Exh. 214b), and  
 16 Summerlin Outpatient Pharmacy (Plaintiff's Exh. 214c).

17 b. The parties agree that the dollar amounts listed in Exhibit 25 accurately  
 18 summarize Plaintiff's medical bills for treatments provided to Plaintiff.

19 c. The parties agree that the dollar amounts listed in Exhibit 25 are usual and  
 20 customary charges in the Las Vegas area for treatments provided to Plaintiff.

21 **2. However, in considering Exhibit 25:**

22 a. You must still decide whether the treatments provided to Plaintiff were  
 23 reasonable.

24 b. You must still decide whether the treatments provided to Plaintiff were necessary.

25 c. You must still decide whether the non-deployment of the air bag caused, as cause  
 26 is defined by the judge, any of Plaintiff's alleged injuries or necessitated any of the treatments  
 27 provided to Plaintiff.  
 28

1 d. You must still decide whether Plaintiff's motor vehicle accident caused, as cause  
2 is defined by the judge, all of Plaintiff's alleged injuries or necessitated all of the treatments  
3 provided to Plaintiff.

4 In addition to reading this instruction to the jury, the Parties agree that Exhibit 25 will  
5 include identical language (paragraphs 1, 1 a. through 1 c., 2, and 2 a. through 2.d) at the  
6 beginning of the document or as a cover page to the document.

7 DATED this 14th day of August, 2014.

8 By: /s/ Clay Robbins, III

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IT IS SO ORDERED this 14th day of August, 2014.

  
U.S. DISTRICT COURT JUDGE